

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

(202) 955-9600

ORIGINAL

EX PARTE OR LATE FILED

FACSIMILE

(202) 955-9792

www.kelleydrye.com

RECEIVED

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DIRECT LINE (202) 887-1230

E-MAIL: Gmorelli@KelleyDrye.com

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 18, 2002

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Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Room TWB-204  
Washington, D.C. 20554

*Re: Ex Parte Presentation in CC Docket Nos. 01-338, 96-98, 98-147*

Dear Ms. Dortch:

Today, Joseph Gillan and Rodney Page, representing Access Integrated Networks ("AIN"), met with Dan Gonzalez of Commissioner Martin's office to discuss the position taken in the above-captioned proceedings by AIN. In particular, they discussed AIN's UNE-P based business plan and the proper treatment of the local switching network element. A copy of the materials distributed at the meeting are attached to this letter.

In accordance with Section 1.1206 of the Commission's rules, an original and one copy of this letter is being filed with your office.

Sincerely,

*Genevieve Morelli*  
Genevieve Morelli

cc: Dan Gonzalez

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## **Access Integrated Networks, Inc.**

**Corporate Headquarters:** Macon, Georgia

**Organizational Structure:** Incorporated, privately held

**Market Area:** 9 Southeastern States; Texas (4<sup>th</sup> quarter, 2002)

**Market Presence:** Over 700 southeastern town and cities

**Target Market:** Small Business Customers

**Distribution Strategy:** Independent Sales Agents

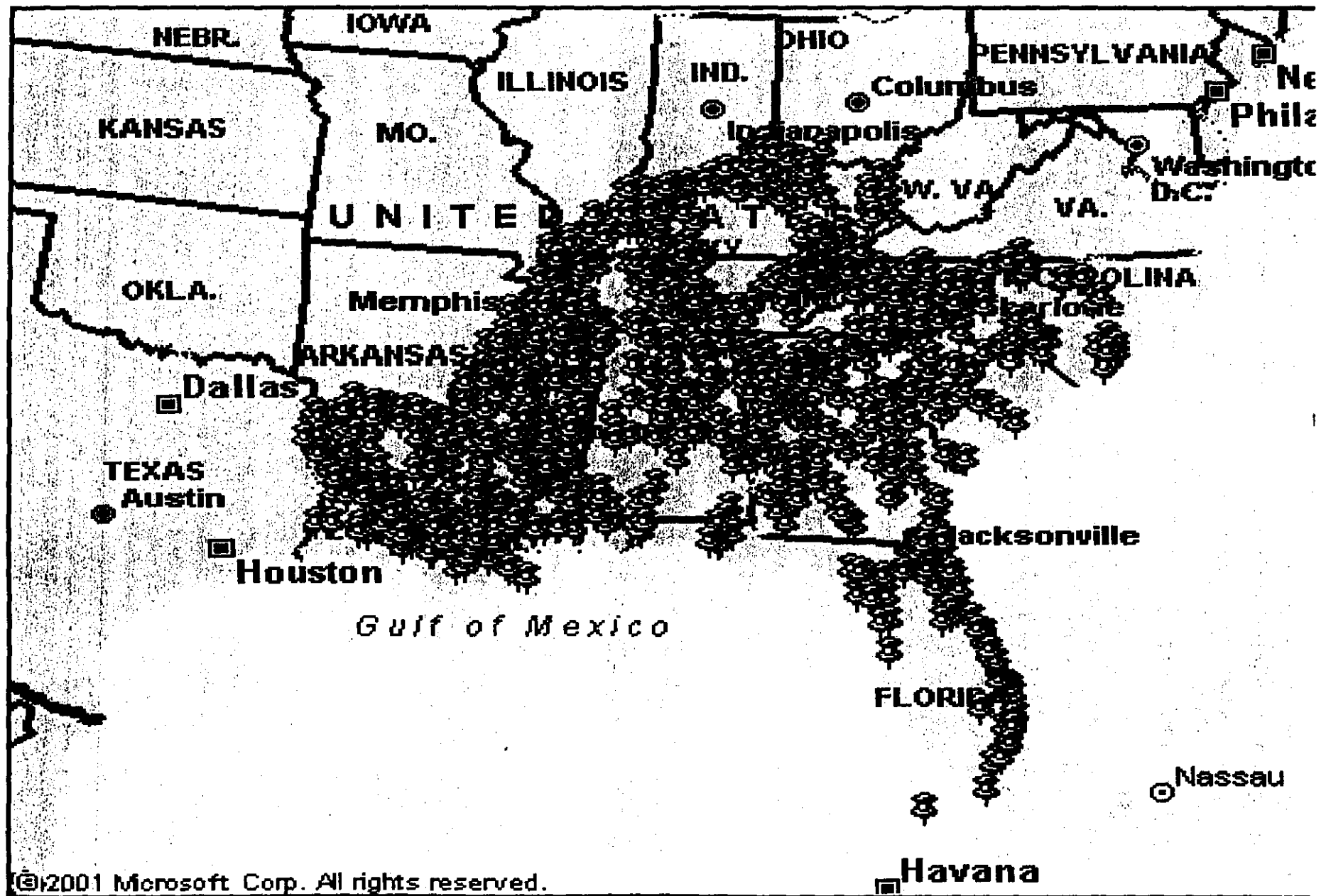
**Value Propositions:**

Cost Savings

Superior Customer Care

### **ACCESS... Vital Statistics**

	<b>Lines</b>	<b>Market Area</b>	<b>Approximate Number of Customers</b>	<b>Employees</b>
<b>1999</b>	11,000	GA, AL	3,600	17
<b>2000</b>	38,000	GA, AL, SC, TN, KY	12,500	60
<b>2001</b>	62,000	GA, AL, SC, TN, KY, NC, MS, LA, FL	21,000	90
<b>July 2002</b>	100,000	GA, AL, SC, TN, KY, NC, MS, LA, FL (Texas...4 <sup>th</sup> Quarter 2002)	30,000	175



## National CLEC Penetration by Entry Strategy (thousands of lines)<sup>1</sup>

Entry Strategy	December 2000	June 2001	Gain
Resale	5,388	4,417	(971)
UNE-L (loops w/o switching)	2,436	3,161	725
UNE-P (loops with switching)	2,838	4,761	1,923
Other Facilities	4,209	4,936	727
Net Change	14,871	17,275	2,404

In the first half of last year, UNE-P was responsible for 80% of the net gain in CLEC lines.

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<sup>1</sup> Source: Status of Local Competition as of June 30, 2001, Industry Analysis Division, Common Carrier Bureau, Federal Communications Commission, released February 27, 2002.

**The Geographic Distribution of Local Competition  
(Texas: October 2001)**

<b>End Offices Sorted by Total Lines</b>	<b>Average Lines per Office</b>	<b>Relative Share</b>	
		<b>UNE-P</b>	<b>UNE-L</b>
Top 50 End Offices	102,571	8%*	2%
Next 50 Offices	54,443	11%*	1%
Next 50 Offices	34,139	12%	1%
Next 50 Offices	20,331	13%	0%
Next 50 Offices	12,309	16%	0%
Next 50 Offices	7,218	17%	0%
Next 50 Offices	4,265	18%	0%
Next 50 Offices	2,532	21%	0%
Next 50 Offices	1,373	25%	0%
Bottom 67 Offices	485	21%	0%

\* More than ½ UNE-P Lines in top two strata.

## Comparing the Competitive Profile of UNE-P and UNE-L Georgia 2002

Wire Center Ranking	Average Lines/CO	Competitive Penetration	
		UNE-P	UNE-L
The 25 Largest Wire Centers	67,977	6%*	3%
Next 25 Largest Wire Centers	40,012	9%*	2%
Next 25 Largest Wire Centers	26,616	8%	1%
Next 25 Largest Wire Centers	13,542	8%	0%
Next 25 Largest Wire Centers	6,943	6%	0%
Next 25 Largest Wire Centers	3,875	7%	0%
Smallest 28 Wire Centers	1,697	6%	0%

\* More than 2/3<sup>rds</sup> of the UNE-P lines in top two strata.